

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CELENA PARKER, as Personal Representative,
for the ESTATE OF DAMITA K. PARKER, deceased,

Plaintiff,

v.

Civil Action No.: 20-cv-12475
Honorable Denise Page Hood
Magistrate Elizabeth A. Stafford

WILLIAM BEAUMONT HOSPITAL d/b/a
BEAUMONT HOSPITAL, ROYAL OAK,
BEAUMONT HEALTH d/b/a ROYAL OAK HOSPITAL,
Severally,

Defendants,

JEFFREY T. MEYERS (P34348)
JACOB A. DERRICK (P84487)
Attorneys for Plaintiff
3200 Greenfield, Suite 260
Dearborn, MI 48120
(313) 961-0130 Fax: 8178
jmeyers@jeffmeyerslaw.com
jderrick@jeffmeyerslaw.com

DANIEL J. DULWORTH (P41784)
DAVID M. CESSANTE (P58796)
STEPHANIE V. ROMEO (P83079)
Clark Hill, PLC
Attorneys for Defendants
500 Woodward Ave., Ste. 3500
Detroit, MI 48226
(313) 965-8300
ddulworth@clarkhill.com
dcessante@clarkhill.com
sromeo@clarkhill.com

**PLAINTIFF'S MOTION FOR ENTRY OF ORDER TO AUTHORIZE
DISTRIBUTION OF WRONGFUL DEATH PROCEEDS**

NOW COMES, Plaintiff, CELENA PARKER, as Personal Representative, for the ESTATE OF DAMITA K. PARKER, Deceased, by and through her attorneys, MEYERS LAW, PLLC, and respectfully requests this Honorable Court enter an Order Authorizing Distribution of Wrongful Death Proceeds, in the above action for the following reasons:

1. On February 14, 2024, this Honorable Court entered an Order Granting Plaintiff's Motion to Approve Confidential Settlement, Costs, Attorney Fees and Partial Distribution of Wrongful Death Proceeds. (**Exhibit 1**, Order Granting Plaintiff's Motion to Approve Confidential Settlement).

2. Attorney Les C. Braverman has been appointed Guardian Ad Litem of the minor grandchildren Cryshawna Hall, Shawn Hall, William Parker, and Evan Parker (**Exhibit 2**, Stipulated Order Appointing Guardian Ad Litem).

3. Prior to, or at the time of the hearing, Mr. Braverman will provide his Guardian Ad Litem report.

4. All individuals having potential interest in the proceeds of this settlement will be notified and provided with a copy of this motion and Notice of Hearing, in accordance with MCL 600.2922(6)(b) and MCL 700.3924(2)(b), once the hearing date is set by this Honorable Court.

5. No portion of the settlement proceeds shall be allocated to the Estate of Damita Parker.

6. The Personal Representative is requesting the entry of an Order Authorizing Distribution of Wrongful Death Proceeds, consistent with a **Confidential Exhibit A** that will be provided to the Court at the time of the hearing and which will be retained by the parties. The exhibit will describe a proposed distribution consistent with any Waivers executed by any individual having a potential interest in the settlement proceeds. MCL 600.2922(6).

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order Authorizing Distribution of Wrongful Death Proceeds for the reasons set forth above.

Respectfully submitted,

MEYERS LAW, PLLC

BY: /s/ Jeffrey T. Meyers

JEFFREY T. MEYERS (P34348)

JACOB A. DERRICK (P84487)

Attorneys for Plaintiff

3200 Greenfield, Suite 260

Dearborn, MI 48210-1802

(313) 961-0130

DATED: May 30, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of May, 2024, I caused a true and exact copy of the foregoing to be filed with the Court's CM/ECF Electronic Case Filing System which should send a Notification (NEF) to the following counsel of record:

Daniel J. Dulworth

ddulwroth@clarkhill.com

David M. Cessante

dcessante@clarkhill.com

Stephanie V. Romeo

Sromeo@clarkhill.com

I certified that I have mailed by certified mail, return receipt requested, as well as by first-class mail, by United States Postal Service of **Plaintiff's Motion for Entry of Order Authorizing Distribution of Wrongful Death Proceeds**, to the following *non-CM/ECF Electron Case Filing System* participants:

Judy Bell, Sister
28400 Lockdale Street, Apt. 201
Southfield, MI 48034-1920

Les C. Braverman, Guardian Ad Litem on
behalf of the minor grandchildren
3509 Biddle Ave.
Wyandotte, MI 48192-6513

Thomas Parker, Brother
1741 Schaefer
Detroit, MI 48227-3435

Shawn Hall, Father
of Cryshawna Hall and Shawn Hall
17614 Roselawn
Detroit, MI 48221

Gary Jones, Brother
15338 Appoline
Detroit, MI 48227-4006

Liszae Bell, Mother
of William Parker and Evan Parker
26157 Princeton
Inkster, MI 48141

Michael Parker, Brother
11701 Bramell Street
Detroit, MI 48239-1338

Victoria Sloan
8283 N. Telegraph Road
Dearborn Heights, MI 48127

I declare under the penalties of perjury that the foregoing statements are true and correct to the best of my information and belief.

/s/ Jeffrey T. Meyers
Jeffrey T. Meyers